

# **EXHIBIT D**

## **DECLARATION OF JAIDEEP VENKATESAN**

**From:** [Jaideep Venkatesan](#)  
**To:** [Kaounis, Angelique](#)  
**Cc:** [Annette Hogue](#); [Snyder, Orin](#); [Krevitt, Josh](#); [Caroline McIntyre](#); [Peter Soskin](#); [Susan Bower](#); [Annette Hogue](#)  
**Subject:** RE: Zhongjie "Jay" Li and Proception AI  
**Date:** Thursday, June 12, 2025 6:08:38 PM  
**Attachments:** [image001.png](#)

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Counsel,

Thank you for your email. We are unable to state whether we can accept service for Proception or Mr. Li at this time. We will follow up with you early next week, at which point we can determine whether a call is necessary.

Regards,

Jay

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**From:** Kaounis, Angelique <AKaounis@gibsondunn.com>  
**Sent:** Thursday, June 12, 2025 2:22 PM  
**To:** Jaideep Venkatesan <jvenkatesan@be-law.com>  
**Cc:** Annette Hogue <ahogue@be-law.com>; Snyder, Orin <OSnyder@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>  
**Subject:** RE: Zhongjie "Jay" Li and Proception AI

You don't often get email from [AKaounis@gibsondunn.com](mailto:AKaounis@gibsondunn.com). [Learn why this is important](#)

Counsel,

We have not heard back from you in response to the below email. Please confirm you are able to accept service of the below-mentioned Complaint and Demand on behalf of your clients. Please also confirm the time tomorrow (Friday, June 13) when you are able to confer—either before 11 am or after 2 pm Pacific.

Thank you,

Angelique

**Angelique Kaounis**

Partner

T: +1 310.552.8546 | M: +1 213.479.1946  
AKaounis@gibsondunn.com

**GIBSON DUNN**

Gibson, Dunn & Crutcher LLP  
2000 Avenue of the Stars Suite 1200N, Los Angeles, CA 90067-4700

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**From:** Kaounis, Angelique

**Sent:** Wednesday, June 11, 2025 7:21 PM

**To:** Jaideep Venkatesan <[jvenkatesan@be-law.com](mailto:jvenkatesan@be-law.com)>

**Cc:** Annette Hogue <[ahogue@be-law.com](mailto:ahogue@be-law.com)>; Snyder, Orin <[OSnyder@gibsondunn.com](mailto:OSnyder@gibsondunn.com)>; Krevitt, Josh <[JKrevitt@gibsondunn.com](mailto:JKrevitt@gibsondunn.com)>

**Subject:** RE: Zhongjie “Jay” Li and Proception AI

Counsel,

Thank you for your letter. Please confirm if you are authorized to accept service of a complaint on behalf of your clients Zhongjie “Jay” Li and Proception and an Arbitration Demand on behalf of Mr. Li.

We can speak by phone on Thursday, June 12 before 11 am, or Friday, June 13 before 11 am or after 2 pm Pacific. Please confirm a time that works for you, and please be prepared to discuss Tesla’s proposed stipulation when we speak.

Thank you,

Angelique

**Angelique Kaounis**

Partner

T: +1 310.552.8546 | M: +1 213.479.1946

[AKaounis@gibsondunn.com](mailto:AKaounis@gibsondunn.com)

**GIBSON DUNN**

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**From:** Annette Hogue <[ahogue@be-law.com](mailto:ahogue@be-law.com)>

**Sent:** Wednesday, June 11, 2025 4:32 PM

**To:** Kaounis, Angelique <[AKaounis@gibsondunn.com](mailto:AKaounis@gibsondunn.com)>

**Cc:** Jaideep Venkatesan <[jvenkatesan@be-law.com](mailto:jvenkatesan@be-law.com)>

**Subject:** Zhongjie “Jay” Li and Proception AI

Ms. Kaounis,

Attached please find correspondence from Jaideep Venkatesan.

Thank you,

Annette

Annette S. Hogue | Bergeson 

Legal Assistant

**O** 408.291.6200 | **D** 408.291.2240 | **F** 408-297.6000

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